

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Civil Action No: 1:23-cv-11800-MRG

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| H.B. BROOKS INTERNATIONAL, INC. d/b/a NETWATCH NORTH AMERICA |) |
| Plaintiff |) |
| v. |) |
| ROYAL SUN FARM LLC, |) |
| Defendant |) |
| GFA FEDERAL CREDIT UNION |) |
| Trustee |) |

STIPULATION FOR PAYMENT OR RETURN OF EQUIPMENT

Now come the parties in the above matter, and with respect to the Court's Order dated April 19, 2024 (the "Order") the Parties hereby stipulate that Royal Sun Farm LLC ("Royal Sun") will, pursuant to an agreement between the parties, on or before May 24, 2024, pay to the Plaintiff, H.B. Brooks International, Inc. d/b/a Netwatch North America ("Netwatch") the sum of \$30,000.00 towards the balance owed to Netwatch and will, further, on or before June 15, 2024, pay an additional \$44,000.00 towards the balance owed to Netwatch. In the event that Royal Sun does not make either of these two payments on or before the above stipulated dates, then Royal Sun will, within two business days of such payment's due date, return the equipment to Netwatch. Regarding future payments owed to Netwatch after June 15, 2024, Royal Sun agrees to comply with the agreement entered into between the parties¹, which in part states that Royal Sun is to begin making further payments of \$5,000.00 per month beginning on January 29, 2024 until the balance owed to Netwatch is paid in full. Royal Sun agrees to be bound by the Court's

¹ The Order requires return of the equipment to Netwatch within ten days' of the Courts' Order or "as otherwise agreed by the Parties".

Order and return the equipment if any payment made pursuant to the agreement between the parties is not made.

Respectfully submitted by the Parties,

/s/ Joseph Perl
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May 14, 2024

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May 14, 2024

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Joseph Perl
Joseph Perl